

	X	
LTS LOHMANN THERAPIE-SYSTEME AG,	:	
	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
WATSON LABORATORIES, INC.,	:	Case No. _____
WATSON PHARMA, INC., and WATSON	:	
PHARMACEUTICALS, INC.,	:	
	:	
Defendants.	:	
	:	
	:	
	:	
	:	
	X	

Plaintiff LTS Lohmann Therapie Systeme AG (“Plaintiff”), by and through its undersigned counsel, respectfully moves pursuant to Federal Rule of Civil Procedure 5(e) and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, to file its Complaint against the above-named Defendants under seal.

Defendants have not yet been served with this Complaint, they have not had the opportunity to review its allegations and to meet and confer with Plaintiff to discuss the

redaction of any such confidential settlement information. In this regard, the attached proposed form of order contemplates that Plaintiff will file a public version of the Complaint within seven (7) days of the filing of the Defendants' Answer or other response to the Complaint pursuant to the Court's Administrative Procedures Governing Filing and Service by Electronic Means.

WHEREFORE, Plaintiff respectfully requests that the Court permit Plaintiff to file and maintain its Complaint under seal until seven (7) days following the filing of Defendants' Answer or response to the Complaint.

Dated: June 20, 2012

McCARTER & ENGLISH, LLP

/s/ Daniel M. Silver  
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Daniel M. Silver (#4758)  
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**LOCAL RULE 7.1.1. CERTIFICATION**

Counsel for Plaintiff has not conferred with counsel for Defendants prior to filing the foregoing motion, because Defendants have not yet been served and their counsel has not been confirmed. As contemplated in the Proposed Form of Order, with respect to this Motion and the filing of a public version of the Complaint, Plaintiff's counsel will meet and confer with the Defendants' counsel once they have been identified.

Dated: June 20, 2012

McCARTER & ENGLISH, LLP

/s/ Daniel M. Silver  
Daniel M. Silver (#4758)

LTS LOHMANN THERAPIE-SYSTEME  
AG,

Plaintiff,

v.

WATSON LABORATORIES, INC.,  
WATSON PHARMA, INC., and WATSON  
PHARMACEUTICALS, INC.,

Defendants.

**CERTIFICATE OF SERVICE**

I, Daniel M. Silver, hereby certify that on June 20, 2012, true and correct copies of the foregoing Motion were caused to be served upon Defendants in the following manner:

**By First Class U.S. Mail**

Watson Laboratories, Inc.  
Morris Corporate Center III  
400 Interpace Parkway  
Parsippany, New Jersey 07054

Watson Pharma, Inc.  
Morris Corporate Center III  
400 Interpace Parkway  
Parsippany, New Jersey 07054

Watson Pharmaceuticals, Inc.  
Morris Corporate Center III  
400 Interpace Parkway  
Parsippany, New Jersey 07054

/s/ Daniel M. Silver  
\_\_\_\_\_  
Daniel M. Silver (#4758)